

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS NATALIE ZHUIKO

DEFENDANTS VENGROFF WILLIAMS, INC.

(b) County of Residence of First Listed Plaintiff BUCKS
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number) Cary L. Flitter, Esq., and Theodore E. Lorenz, Esq., Flitter Lorenz, P.C., 450 N. Narberth Avenue, Suite 101, Narberth, PA 19072, (610) 822-0782

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | |
|--|---|----------------------------|----------------------------|
| PTF | DEF | PTF | DEF |
| Citizen of This State <input type="checkbox"/> 1 | <input type="checkbox"/> 1 Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State <input type="checkbox"/> 2 | <input type="checkbox"/> 2 Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 | <input type="checkbox"/> 3 Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened

Transferred from ☐ 5 another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause: FDCPA 15 USC § 1692

VII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** **CHECK YES only if demanded in complaint** **JURY DEMAND:** ☒ Yes ☐ No.

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE 9/29/14 SIGNATURE OF ATTORNEY OF RECORD Cary L. Flitter

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 350 Laurel Oaks Drive, Langhorne, PA 19047-8528

Address of Defendant: P.O. Box 4155, Sarasota, FL 34230-4155

Place of Accident, Incident or Transaction: 350 Laurel Oaks Drive, Langhorne, PA 19047-8528

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases

(Please specify) FDCPA, 15 USC § 1692

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability (Asbestos)
9. ☐ All other Diversity Cases
(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, _____, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☐ Relief other than monetary damages is sought

DATE: _____

Attorney-at-Law

Attorney I.D.

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 9/29/14

CIV.609 (4/03)

[Signature]
Attorney-at-Law

35047
Attorney I.D.

APPENDIX I

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

NATALIE ZHUIKO

V.

VENGROFF WILLIAMS, INC.

: CIVIL ACTION
:
:
:
:
: NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

9/29/14
Date

Cary L. Flitter
Attorney at Law

CARY L. FLITTER
Attorney for Plaintiff

(610) 822-0782
Telephone
(Civ.660) 10/02

(610) 667-0552
Fax Number

cflitter@consumerslaw.com
E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NATALIE ZHUIKO
350 Laurel Oaks Drive
Langhorne, PA 19047-8528,

Plaintiff,

vs.

VENGROFF WILLIAMS, INC.
P.O. Box 4155
Sarasota, FL 34230-4155

Defendant

CIVIL ACTION

NO.

COMPLAINT

I. INTRODUCTION

1. This is a suit under the remedial provisions of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”).

2. Defendant collection agency sent a series of increasingly demanding collection correspondence which created an impermissible and false sense of urgency, in violation of the Act. Defendant also failed to comply with the requirements for an initial communication with the consumer.

II. JURISDICTION

3. Jurisdiction is premised upon the presence of a federal question, 28 U.S.C. §§1331. The FDCPA specifically confers subject matter jurisdiction in this Court, 15 U.S.C. §1692k(d).

4. Venue is proper as defendant regularly does business in this district and has caused harm in this district.

III. PARTIES

5. Plaintiff is Natalie Zhuiko (“Plaintiff” or “Zhuiko”) a consumer who resides in Langhorne, Pennsylvania at the address captioned.

6. Defendant Vengroff Williams, Inc. (“Defendant” or “VWI”) is a foreign corporation with an office for the regular transaction of business in Sarasota, FL.

7. Defendant regularly collects or attempts to collect consumer debts alleged to be due another.

8. Defendant is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

IV. STATEMENT OF CLAIM

9. On or about October 1, 2013, Defendant VWI mailed an initial collection letter to Plaintiff in an attempt to collect a consumer debt alleged due. A copy of the October 1, 2013 letter is attached hereto as Exhibit A (redacted in part per Fed. R. Civ. P. 5.2).

10. The debt claimed due arose from the rendition of medical services to Plaintiff.

11. The notice of validation rights contained in the initial October 1, 2013 collection notice stated that the sum demanded “may including collection fees and interest charges”. The notice did not state how much, if any, was collection fees and interest, nor whether collection fees and interest was provided by a contract or permitted by law. *Cf.*, 15 U.S.C. § 1692f(1), 1692e.

12. Thereafter on November 8, 2013, Defendant sent a further letter which indicated that the “amount is due immediately.” A copy of the November 8, 2013 letter is attached hereto as Exhibit B (redacted in part per Fed. R. Civ. P. 5.2).

13. Thereafter, on December 11, 2013, Defendant sent a further collection notice which stated “If we do not hear from you or receive payment in full within ten (10) days, you

will leave us with no alternative but to take any and all additional collection efforts our client feels necessary to protect their interests.” A copy of the December 11, 2013 letter is attached hereto as Exhibit C (redacted in part per Fed. R. Civ. P. 5.2).

14. On January 1, 2014, Defendant sent a further collection notice to Plaintiff. The January 1st letter provided “Unless we receive a payment within forty eight (48) hours of receipt of this letter, we will be forced to proceed with any additional collection efforts our client deems necessary.” A copy of the January 1, 2014 letter is attached hereto as Exhibit D (redacted in part per Fed. R. Civ. P. 5.2).

15. Thereafter, on January 23, 2014, Defendant wrote a further collection letter which stated “We must advise that if we do not hear from you or receive payment in full within seven (7) days, there will be no alternative but to take any and all appropriate actions to protect our client’s interest.” The letter did not define “any and all appropriate actions” but that term may be fairly read to encompass legal action. A copy of the January 23, 2014 letter is attached hereto as Exhibit E (redacted in part per Fed. R. Civ. P. 5.2).

16. On February 26, 2014, Defendant sent a further collection letter to Zhuiko. The February 16th letter stated in pertinent part “We must advise that if we do not hear from you or receive payment in full within seven (7) days, there will be no alternative but to continue collection efforts and any other remedies our client allows to protect their interests.” (emphasis added). The term “remedies” is not defined in the letter but may reasonably be read to imply legal remedies or judgment remedies. A copy of the February 26, 2014 letter is attached hereto as Exhibit F (redacted in part per Fed. R. Civ. P. 5.2).

COUNT I
(FAIR DEBT COLLECTION PRACTICES ACT)

17. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

18. The FDCPA, 15 U.S.C. § 1692e prohibits a debt collector from using “any false, deceptive or misleading representation or mean in connection with the collection of any debt.

19. The FDCAP at 15 U.S.C. § 1692e(5) prohibits “the threat to take any action that cannot be legally taken or that is not intended to be taken.”

20. The statement in the succeeding collection letters of brief, specific time periods for payment, coupled with the threat to “take any and all appropriate actions ...” culminating in the February 26, 2014 letter that “there will be no alternative but to continue collection efforts and any other remedies our client allows to protect their interest” collectively creates a misimpression of the prospect of legal action and a false sense of urgency prohibited by the Act.

21. The initial letter fails to properly identify the amount of the debt, 15 U.S.C. § 1692g.

COUNT II - CLAIM FOR RELIEF

22. Defendant debt collector has violated the FDCPA, 15 U.S.C. § 1692e et seq. in the manner set forth above

WHEREFORE, Plaintiff Natalie Zhuiko demands judgment against Defendant Vengroff Williams, Inc.t for:

- (a) Damages as provided by the Act, 15 U.S.C. § 1692k;
- (b) Statutory attorney’s fees and costs; and
- (c) Such other and further relief as the Court shall deem just and proper.

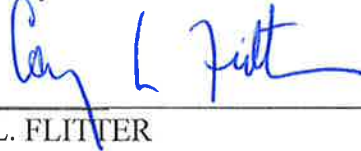
VII. JURY DEMAND

Pursuant to Fed.R.Civ.P. 38, Plaintiff demands trial by jury as to all issues so triable.

Respectfully submitted:

DATE:

9/29/14



CARY L. FLITTER
THEODORE E. LORENZ
ANDREW M. MILZ
Attorneys for Plaintiff

FLITTER LORENZ, P.C.
450 N. Narberth Avenue, Suite 101
Narberth, PA 19072
(610) 822-0782

EXHIBIT “A”



VENGROFF WILLIAMS, INC.
P O BOX 4155 6/766
SARASOTA FL 34230 4155



Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 363-3867
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
551	345
DATE	AMOUNT DUE
10/01/13	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 453 as your User ID and 429 as your Password.

[DP]

VALIDATION NOTICE

To Whom it may concern ,

We have been engaged by the above creditor who has turned over your account for collection in the amount listed above which may include collection fees and interest charges.

NOTICE

Unless, within thirty days after your receipt of this notice, you dispute the validity of the debt or any portion thereof, we will assume the debt to be valid. If, within thirty days after your receipt of this notice, you notify us in writing that the debt or any portion thereof is disputed, we will obtain verification of the debt or a copy of a judgment, if any, and we will mail to you a copy of such verification or judgment. If the original creditor is different from the creditor named above, then upon your written request within thirty days after the receipt of this notice we will provide you with the name and address of the original creditor.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

(9D1)

EXHIBIT “B”



VENGROFF WILLIAMS, INC.
P O BOX 4155 6/516
SARASOTA FL 34230 4155



Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 363-3867
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



[DP]

OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
1551	345
DATE	AMOUNT DUE
11/08/13	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 453 as your User ID and 429 as your Password.

IMPORTANT NOTICE

To Whom it may concern ,

We have been engaged by the above creditor who has turned over your account for collection in the amount listed above which may include collection fees and interest charges.

This amount is due immediately. Unless you have evidence indicating the balance is in error, please forward your check by return mail, payable to our client within ten (10) days to this office.

Further questions must be directed to the undersigned.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

(9D3)

EXHIBIT “C”



VENGROFF WILLIAMS, INC.
P O BOX 4155 4/426
SARASOTA FL 34230 4155



Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 363-3867
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
1551	845
DATE	AMOUNT DUE
12/11/13	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 453 as your User ID and 429 as your Password.

[DP]

IMPORTANT NOTICE

To Whom it may concern ,

We have been engaged by the above creditor who has turned over your account for collection in the amount listed above which may include collection fees and interest charges. Our previous attempts to reach you have been unsuccessful.

If we do not hear from you or receive payment in full within ten (10) days, you will leave us with no alternative but to take any and all additional collection efforts our client feels necessary to protect their interests.

We suggest that if you wish to avoid such additional efforts, you take the time now to make a telephone call to this office or send a check payable to our client.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

(9D4)

EXHIBIT “D”



VENGROFF WILLIAMS, INC.
P O BOX 4155 6/777
SARASOTA FL 34230 4155



Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 363-3867
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
551	345
DATE	AMOUNT DUE
01/01/14	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 453 as your User ID and 429 as your Password.

[DP]

IMPORTANT NOTICE

To Whom it may concern ,

As stated in our previous correspondence we have been engaged to represent the above client. They have turned over your account for collection in the amount listed above which may include collection fees and interest charges. This amount is due immediately.

This letter will serve as demand for payment in full of the outstanding balance due. Unless we receive a payment within forty eight (48) hours of receipt of this letter, we will be forced to proceed with any additional collection efforts our client deems necessary.

Your IMMEDIATE attention is necessary. Your check should be made payable to our client and mailed to this office today.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

In order to process your payment more efficiently, please detach and return the lower portion of this letter. Fill change of address/phone if applicable.

CONTROL#: 345

ACCOUNT#: 551

ADDRESS _____

CITY _____ STATE _____ ZIP _____ TELE (____) _____

(9D5)

EXHIBIT “E”



VENGROFF WILLIAMS, INC.
P O BOX 4155 7/1063
SARASOTA FL 34230 4155

1 10000 0000 0000 0000 0000 0000 0000 0000

Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 363-3867
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
551	5345
DATE	AMOUNT DUE
01/23/14	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 5345 as your User ID and 5345 as your Password.

[DP]

IMPORTANT NOTICE

To Whom It may concern

An explanation of the above balance was previously forwarded. To date, we have not received a response.

We must advise that if we do not hear from you or receive payment in full within seven (7) days, there will be no alternative but to take any and all appropriate actions to protect our client's interest.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

(9D7)

EXHIBIT “F”



VENGROFF WILLIAMS, INC.
P O BOX 4155 7/1285
SARASOTA FL 34230 4155



Phone: (800) 556-0992 EXT: 15327
 Fax: (941) 866-0662
 Se habla español

ZHUIKO, NATALIE
 350 LAUREL OAKS DR
 LANGHORNE PA 19047-8528



OUR CLIENT	
KEYSTONE HEALTH PLAN EAST	
ACCOUNT #	Reference #
551	345
DATE	AMOUNT DUE
02/26/14	\$316.35

1012 RMG

You can now pay by phone or using our secure site over the Internet.

Pay by phone at 877-682-6141
 or on the Web at www.payvw.com

Enter 453 as your User ID and 429 as your Password.

[DP]

To Whom it may concern ,

We have been engaged by the above creditor who has turned over your account for collection in the amount listed above. This may include collection fees and interest charges. An explanation of the above balance was previously forwarded. To date, we have not received a response. This amount is immediately due.

We must advise that if we do not hear from you or receive payment in full within seven (7) days, there will be no alternative but to continue collection efforts and any other remedies our client allows to protect their interest.

Sincerely,

ROBERT GRIFFIN
 Collection Agent

"This company is a debt collector. We are attempting to collect a debt, and any information obtained will be used for that purpose."

(907)